

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

TRAVIS GLASS,

§

Plaintiff,

§

Civil Action No.: 1:21-cv-00543-JCH-JMR

v.

XTO ENERGY, INC., and TOMMIE CRIDDLE, individually and as agent or employee of XTO ENERGY, INC. or as agent or employee of INTEGRITY INSPECTION SERVICES, LLC and INTEGRITY INSPECTION SERVICES,

§

Defendants.

§

DECLARATION OF MARK SCRUGGS IN SUPPORT OF INTEGRITY INSPECTION SERVICES, LLC'S MOTION TO DISMISS

I, Mark Scruggs, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that:

1. I am President of Integrity Inspection Services, LLC.
2. In that role, I have authority to determine what agency individuals who work on behalf of Integrity have in the field.
3. Inspectors working in the field on behalf of Integrity have no authority or agency of any sort from Integrity to discipline, fire, or otherwise interfere in any contractual or employment relationships of workers affiliated with other entities.
4. To the extent that Tommie Criddle is alleged to have interfered in the contract of Plaintiff Glass or any other worker, he would have been doing so outside of the scope of his agency or authority from Integrity.
5. Criddle has not worked for Integrity for a number of years.

6. Integrity does not control who XTO has on XTO sites, and it had no control over who TRC hires or fires. Indeed, Integrity had no business relationship with TRC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 3, 2023.

Mark Scruggs

Mark Scruggs